

## **CALFED Bay-Delta Program Summary of Comments Received**

The Program has received 48 comment letters about the Draft Programmatic EIS/EIR as of April 30, 1998.

### Extension of Public Review Period

Several of the letters have requested an extension of the public comment period. Suggested extension periods have ranged from 60 to 120 days. Many of the letters requesting an extension have been filed by state and federal legislators and major stakeholder groups, including:

California Assemblyman Tom Woods  
State Senator Maurice Johannessen  
Congressman Wally Herger  
The Regional Council of Rural Counties (RCRC)  
The Environmental Water Caucus (EWC)  
Southern California Association of Governments

### Water Use Efficiency

Several comments from members of the general public have criticized the Program's water use efficiency program as being insufficient. Several letters have suggested that CALFED incorporate specific water conservation measures—such as tiered pricing, horizontal-axis washing machines, and drought-tolerant landscaping—within the water use efficiency program in order to strengthen it.

### Insufficiency of Environmental Documentation

The Program has received several copies of a form letter from members of the general public that urge the Program to consider a 4<sup>th</sup> alternative, an alternative that maximizes restoration and protection of watersheds and groundwater basins and that maximizes water use efficiency.

One letter from a member of the public suggests that the Draft Programmatic EIS/EIR fails to adequately address environmental issues and that it underestimates the funds necessary to rehabilitate the Bay-Delta ecosystem. He also suggests that the document does not adequately represent the cost of the full Bay-Delta solution since it does not account for mitigation costs.

A separate letter from a BDAC member similarly complains that the Draft fails to provide the cost-benefit analyses necessary to assess if Program actions will achieve their objectives cost-effectively. He also questions many of the policy and modeling assumptions that underlie the impact analysis, and he criticizes the Draft for failing to explain many of its assertions regarding impacts. He also suggests that the Draft does not adequately account for the impacts of actions associated with the Ecosystem Restoration Plan. He also argues that Alternative 2 was not optimized before undergoing impact analysis.

### Ecosystem Restoration

Several letters from members of the general public have expressed support for restoring and protecting the Bay-Delta ecosystem. One letter argues that habitat restoration is inappropriate until the associated water needs have been quantified.

### Conveyance/Alternative 3

Several letters from the general public have expressed **opposition** to the isolated conveyance facility that is part of Alternative 3, citing its cost, its potential impact upon Delta water quality, its potential impact upon fisheries, and its capacity for siphoning large volumes of water from the northern part of the state. Conversely, a few letters have directly expressed **support** for Alternative 3 because it: improves export water quality; reduces risk of export outages because of seismic events; and improves operational flexibility.

### Storage

Several letters from members of the general public have expressed general opposition to new dams, suggesting that the state should live within its existing developed water supply by implementing water conservation measures.

Conversely, several letters from members of the general public and elected officials argue that the Program must include additional storage projects to help meet current and future demand, and a subset of these letters argues that the Program must begin pursuing these storage projects early to ensure their timely completion.

Two letters expressed concern about the effects of proposed south-of-Delta storage on south Delta residents, citing the siltation effects of temporary dams in the south Delta.

### Land Retirement

The Program has received a few letters from members of the general public and elected officials expressing opposition to land retirement and fallowing proposals, citing their employment and economic impacts upon local communities and third parties.

### Alternative Water Supply Projects

One letter criticizes the Draft for not exploring land retirement as a nonstructural means for augmenting the state's water supply. Another letter suggests exploring desalinization as an alternative water supply strategy.

### Growth-Inducing Impacts

A couple of letters from the general public have expressed concern about increasing the state's water supply owing to the urban development that it spawns. They argue for managing growth so that it conforms to the state's existing water supply.

### Costs

A couple of letters from members of the general public expressed reservations about the anticipated cost of the Bay-Delta solution. Other letters criticize the Draft for being too vague about the costs associated with Program actions and for failing to specify funding sources.

### Levees/Flood Control

A letter from a congressional representative criticized the Program for not adequately addressing flood issues. The use of setback levees would eliminate productive farmland, thereby reducing the jobs and the economic output of source counties. Levee maintenance must be coupled with additional storage in the northern part of the state to provide effective flood control.

### Watershed Management

A congressional representative argues that the Program must expand the restoration of upper watersheds to increase water quality, supply, and timing benefits.

### Water Quality

A couple of letters from the general public have indicated the importance of improving water quality by managing industrial and agricultural pollution sources.

### Assurances/Implementation

One letter from a major stakeholder group expressed concern that the Program has made limited progress on the legal assurances necessary to implement the Bay-Delta solution.

### Water Transfers

A couple of letters from members of the public and elected officials argue that water transfers alone are insufficient to address the state's water needs. An elected official from Fresno County opposes the transfer of water outside of county boundaries.